

Franklin Mendez
P.O. Box 304
New York, NY 10108
fmendez3327@gmail.com
(646) 641-6805

May 16, 2025

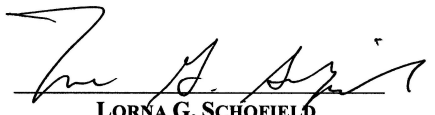
Pro Se Office
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Application **DENIED**. Plaintiff is apprised that, pursuant to the Court's Individual Rule III.C.3 and Local Rule 37.2, he must first confer with Defendant regarding any discovery dispute before requesting to file a motion to compel. The Clerk of Court is respectfully directed to close the motion at Dkt. No. 91

The Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Dated: May 20, 2025
New York, New York

Re: Franklin Mendez v. John Jay College of Criminal Justice
Case No. 1:23-cv-08816 (LGS)


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

I respectfully write to inform the Court that on **May 6, 2025**, I served **Plaintiff's First Request for Production of Documents and Interrogatories** on Defendant **John Jay College of Criminal Justice**, pursuant to **Federal Rules of Civil Procedure 29, 33, and 34**. As of the date of this letter, Defendant has not responded or produced any documents to said request.

Accordingly, I respectfully move to **compel Defendant's compliance** with its discovery obligations. This request seeks information central to the factual record of this case, particularly regarding Defendant's handling of disability accommodations under the **Americans with Disabilities Act (ADA)** and **Section 504 of the Rehabilitation Act**.

Specifically, I request that the Court compel Defendant to produce all documents, audio recordings, transcripts, notes, chat logs, and other materials related to the Zoom meeting entitled **"Investing in Your Success at JJ"**, held on **Thursday, September 7, 2023, at 11:30 AM** (Meeting ID: 828 8936 7262, Passcode: 733187). This meeting, organized by Assistant Director **Gizele Terry** of the Office of Accessibility Services and attended by senior administrators including **Nadia Griffith-Allen**, Vice President **Brian Kerr**, and **Dr. Denise B. Maybank**, Vice Chancellor for Student Affairs at **The City University of New York (CUNY)**, addressed matters directly relevant to this litigation.

Enclosed for the Court's review are: